

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ALEXIS RICHARDSON, JAY SANDLER,
LUBNA PESHIMAM, TRACEY ANN
BERTRAND, MOLLIE KRENGEL, AND
NANCIE LIGON, Individually and on Behalf of
All Others Similarly Situated

Plaintiffs,

v.

L'OREAL USA, INC.,

Defendant.

Case No. 13-CV-00508-JDB

The Honorable John D. Bates

DATE: October 11, 2013

TIME: 9:00 a.m.

JUDGE: Honorable John D. Bates

**PLAINTIFFS' UNOPPOSED MOTION FOR AN AWARD OF ATTORNEYS'
FEES, REIMBURSEMENT OF EXPENSES TO CLASS COUNSEL AND INCENTIVE
AWARD PAYMENTS TO THE CLASS REPRESENTATIVES**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, on October 11, 2013, at 9:00 a.m., or as soon thereafter as this matter may be heard in the courtroom of the Honorable John D. Bates, United States District Court for the District of Columbia, 333 Constitution Avenue N.W., Washington, D.C. 20001, pursuant to the Court's Order of Preliminary Approval of Settlement, Certification of Settlement Class, Approval of the Notice Plan, and Scheduling A Date for a Final Fairness Hearing, entered June 27, 2013, Plaintiffs Alexis Richardson, Jay Sandler, Lubna Peshimam, Tracey Ann Bertrand, Mollie Kregel, and Nancie Ligon (collectively, "Plaintiffs" or "Class Representatives"), on behalf of themselves and each of the Settlement Class Members, hereby move, pursuant to Rules 23(h) and 54(d)(2) of the Federal Rules of Civil Procedure and in accordance with the applicable case law, for an order: (1) awarding attorneys' fees and expenses to Plaintiffs' Counsel in the amount of \$950,000; and (2) awarding incentive awards to the Class Representatives in the amount of \$1,000 each for a total of \$6,000. This motion is based upon Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement, Certification of Settlement Class, Approval of the Notice Plan, and Scheduling a Date for a Final Fairness Hearing and the corresponding Declarations and exhibits attached thereto; Plaintiffs' Memorandum of Law in Support of Plaintiffs' Unopposed Motion for an Award of Attorneys' Fees, Reimbursement of Expenses to Class Counsel and Incentive Award Payments to the Class Representatives; the Declarations of Clayton D. Halunen, Azra Z. Mehdi and Michael D. Lieder in Support of Plaintiffs' Unopposed Motion for an Award of Attorneys' Fees, Reimbursement of Expenses to Class Counsel and Incentive Award Payments to the Class Representatives and the exhibits attached thereto, which are filed concurrently herewith; the papers, records and

pleadings of the action; and such other written or oral argument as may be presented or required by the Court.

This motion is made on the grounds that, *inter alia*: (1) the requested fees and expenses are reasonable and fair and were necessarily incurred to achieve the excellent results on behalf of the Settlement Class; (2) the requested fees and expenses are the product of protracted arm's-length negotiations between the parties and mediation before the Honorable Ronald M. Sabraw (Ret.); (3) the Settlement obtained by Class Counsel confers substantial valuable injunctive relief to Class Members; (4) a service award of \$1,000 for each Class Representative is reasonable and fair for the time and effort they expended in pursuing this Action; and (5) no Class member or other individual or entity except the Defendants could possibly be injured if the requested fee and expense awards and service awards were unreasonable and unfair, and the Defendants do not oppose Plaintiffs' motion.

Respectfully submitted,

MEHRI & SKALET, PLLC

/s/ Michael Lieder
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ECF CERTIFICATION

The undersigned hereby certifies that, on August 21, 2013, a copy of the foregoing Plaintiffs' Unopposed Motion for an Award of Attorneys' Fees, Reimbursement of Expenses to Class Counsel and Incentive Award Payments to the Class Representatives was served on all counsel of record via electronic case filing notification. The filing attorney attests that he has obtained concurrence regarding the filing of this document from the signatories to this document.

Dated: August 21, 2013

By: /s/ Michael Lieder
MICHAEL LIEDER